

COHEN & GREEN

August 20, 2024

Hon. Orelia E. Merchant, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East, 6C South
Brooklyn, New York 11201

By Electronic Filing.

Re: York v. City of New York, 22-cv-06432

Dear Judge Merchant:

I am co-counsel for Plaintiff in the case above. I write to ask for an extension of 45 days of the default 14 days under Rule 54(d)(2)(B)(i) to apply for attorneys' fees pursuant to 42 U.S.C. § 1988 and the judgment entered on August 26, 2024 (ECF No. 50). The extension would allow the parties time to negotiate and attempt to resolve the issue without the Court's intervention.¹ Defendants consent to this application.

Under Rule 54, the deadline for an application would normally be September 9, 2024. With this extension, the new deadline would be October 24, 2024.

As ever, I thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/ Pronouns: Mx., they/ their/ them

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff

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Ridgewood, New York 11385

cc:

All relevant parties by ECF.

¹ Plaintiff served a demand and timesheets on August 20, 2024 (e.g., after accepting the Offer of Judgment but before the judgment was formally entered), and we are waiting for Defendants to counter — but we believe settlement is likely here.